

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

OCT 19 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Val, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

COREY LAMAR EARLS,

Defendant.

Case No.

CR 21-295 F

Violations: 18 U.S.C. § 113(a)(8)
18 U.S.C. § 1152
18 U.S.C. § 113(a)(4)
18 U.S.C. § 2262(a)(1)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Assault by Strangulation)

On or about June 17, 2021, in Blanchard, Oklahoma, located within Indian country
in the Chickasaw Nation Reservation and the Western District of Oklahoma,

----- COREY LAMAR EARLS, -----

a non-Indian, knowingly assaulted his spouse, intimate partner, and dating partner, A.M.,
an Indian, by strangling, and attempting to strangle A.M. by intentionally, knowingly, and
recklessly using his hands and arms to apply pressure to A.M.'s throat and neck in order to
impede her normal breathing and circulation.

All in violation of Title 18, United States Code, Sections 113(a)(8) and 1152.

COUNT 2
(Assault by Striking, Beating and Wounding)

On or about June 17, 2021, in Blanchard, Oklahoma, located within Indian country in the Chickasaw Nation Reservation and the Western District of Oklahoma,

----- **COREY LAMAR EARLS**, -----

a non-Indian, knowingly struck, beat, and wounded A.M., an Indian, by using his hand to strike A.M.'s face and body.

All in violation of Title 18, United States Code, Sections 113(a)(4) and 1152.

COUNT 3
(Interstate Violation of Protection Order)

On or about June 17, 2021, in Blanchard, Oklahoma, located within Indian country in the Chickasaw Nation Reservation and the Western District of Oklahoma,

----- **COREY LAMAR EARLS**, -----

a non-Indian, entered Indian country and traveled within the special maritime and territorial jurisdiction of the United States with the intent to engage in conduct that would violate the portion of a protection order that provided protection against violence, threats and harassment against A.M., and that prohibited contact and communication with and prohibited physical proximity to A.M., and subsequently engaged in such conduct by being in physical proximity to A.M., and contacting and communicating with A.M., and by physically assaulting A.M. with his hands, arms, and feet.

All in violation of Title 18, United States Code, Section 2262(a)(1), the penalty for which is found at Title 18, United States Code, Section 2262(b)(5), and Title 18, United States Code, Section 1152.

A TRUE BILL:

A handwritten signature in blue ink, appearing to be 'gn' followed by a long horizontal stroke.

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
Acting United States Attorney

A handwritten signature in blue ink, appearing to be 'E. Simpson'.

ERIKA N. SIMPSON
Special Assistant United States Attorney